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July 14, 2017

The Honorable J. Paul Oetken  
U.S. District Court Southern District of New York  
40 Foley Square, Room 2101  
New York, NY 10007

Re: *Securities and Exchange Commission v. Im*  
17-cv-3613-JPO

Dear Judge Oetken:

Plaintiff Securities and Exchange Commission (“SEC”) and Defendant James Im write jointly to request a brief extension of the deadline to move, answer or otherwise respond to the Complaint in the above-referenced matter, and to seek Your Honor’s approval of a proposed briefing schedule in the event Mr. Im files a motion to dismiss. This is the parties’ first request for an extension.

As brief background, Mr. Im’s counsel waived service of summons on May 16, 2017. Pursuant to Rule 4, Mr. Im’s deadline to move, answer or otherwise respond to the Complaint is July 17, 2017.

The parties have agreed to the following revised deadline and briefing schedule, subject to the Court’s approval:

**August 7, 2017:** Deadline for Mr. Im to move, answer or otherwise respond to the Complaint;

**September 22, 2017:** Deadline for SEC to submit brief in opposition to Mr. Im’s motion to dismiss;

**October 13, 2017:** Deadline for Mr. Im to submit reply brief in further support of motion to dismiss.

Respectfully,

/s/ Michael Martinez  
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